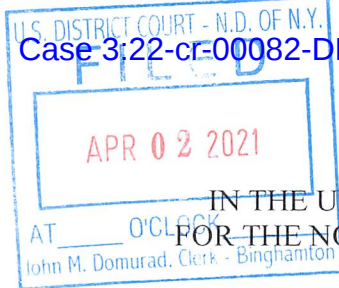


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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

In Re . . .  
**CRIMINAL COMPLAINT**

) Criminal No. 3:21-MJ-191 (ML)  
)  
) **Government's Sealing Application**  
)  
) **Filed Under Seal**  
)  
)  
)

The United States of America, by and through its counsel of record, the United States Attorney for the Northern District of New York ["NDNY"], hereby applies to the Court pursuant to NDNY Criminal Local Rule 13.1 for the sealing of the following: (a) one or more documents submitted to the Court at the same time as this sealing application, which document(s) request a Court order authorizing certain investigative activity or an arrest warrant; (b) the Court's order authorizing such investigative activity or an arrest warrant; (c) this sealing application; and (d) the Court's sealing order, which has the same caption.

The United States respectfully requests such sealing because public filing of the above-described documents may:

<input checked="" type="checkbox"/>	Jeopardize an ongoing federal criminal investigation by revealing the existence of that investigation to potential targets and subjects of the investigation;
<input checked="" type="checkbox"/>	Jeopardize the safety of a person who has provided information and/or other assistance to the criminal investigation or the family and/or friends of such person by revealing such person's cooperation with the investigation to those under investigation or their associates;
<input type="checkbox"/>	Jeopardize the safety of law enforcement personnel;
<input checked="" type="checkbox"/>	Reveal law enforcement methods, techniques, and/or procedures, thereby jeopardizing future investigations using such methods, techniques, and/or procedures;
<input type="checkbox"/>	Reveal non-public information about one or more victims and/or witnesses and such information could lead to adverse financial and/or social consequences for such person(s);
<input checked="" type="checkbox"/>	Reveal non-public information about one or more targets or subjects of the investigation who have not been charged with a crime in the relevant investigation and such information could lead to adverse financial and/or social consequences for such person(s);
<input type="checkbox"/>	Reveal matters in violation of federal law, such as Rule 6(e) of the Federal Rules of Criminal Procedure and/or Title 26, United States Code, Section 6103;
<input type="checkbox"/>	Jeopardize national security.

Along with the above-described documents, the government is filing a redacted version of the proposed sealing order, one that has the words “filed under seal” replaced with the words “for public filing” and has the case caption redacted. The government has no objection to the public filing of this version of the proposed sealing order.

The government further requests the following:

- 1) That the government be permitted to disclose the sealed documents to appropriate law enforcement officials; and
- 2) That the Court order that the above-described documents remain under seal until further order of this Court or any court of competent jurisdiction, except that if the document(s) filed under seal relate solely to a government request for an arrest warrant, that such documents and the warrant be unsealed upon the arrest of the person to be arrested.

If this Court determines that the above-described document(s) should not be filed under seal, the government requests that the Court return the document(s) to the government without filing them publicly.

Dated: April 2, 2021

ANTOINETTE T. BACON  
Acting United States Attorney

By: /s/ Andrew D. Beaty  
ANDREW D. BEATY  
Assistant United States Attorney  
Bar Roll No. 701226